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13 *Toshiba America, Inc., Toshiba America*

14 *Information Systems, Inc., and Toshiba*

15 *America Electronic Components, Inc.*

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 (SAN FRANCISCO DIVISION)

19 IN RE: CATHODE RAY TUBE (CRT)
20 ANTITRUST LITIGATION

Case No. 07-5944 SC
MDL No. 1917

21 This Document Relates to
22 Case No. 13-cv-1173-SC (N.D. Cal.)

23 SHARP ELECTRONICS CORPORATION;
24 SHARP ELECTRONICS MANUFACTURING
25 COMPANY OF AMERICA, INC.,

26 Plaintiffs,

27 v.

28 HITACHI, LTD., *et al.*,

Defendants.

**DECLARATION OF LUCIUS B. LAU
IN SUPPORT OF THE TOSHIBA
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE DOCUMENT
UNDER SEAL PURSUANT TO
CIVIL LOCAL RULES 7-11 AND
79-5(d)**

DECLARATION OF LUCIUS B. LAU IN SUPPORT OF THE
TOSHIBA DEFENDANTS' ADMINISTRATIVE MOTION TO FILE
DOCUMENT UNDER SEAL PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-5(d)

Case No. 07-5944 SC

MDL No. 1917

1 I, Lucius B. Lau, hereby declare as follow:

2 1. I am Counsel with the law firm of White & Case LLP, attorneys for
3 Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Information
4 Systems, Inc., and Toshiba America Electronic Components, Inc. (collectively, the "Toshiba
5 Defendants"). I make this declaration in support of the Toshiba Defendants' Administrative
6 Motion to File Document Under Seal Pursuant to Civil Local Rules 7-11 and 79-5(d), dated
7 February 4, 2014.

8 2. I have personal knowledge of the facts set forth in this declaration and if
9 called upon to do so I could and would testify competently to such matters.

10 3. On June 18, 2008, the Court issued a Stipulated Protective Order (Dkt. No.
11 306) (the "Stipulated Protective Order").


12 4. On December 20, 2013, Plaintiffs Sharp Electronics Corporation and Sharp
13 Electronics Manufacturing Company of America, Inc. served Responses and Objections to
14 Defendants MT Picture Display Co., Ltd. and LG Electronics USA, Inc.'s First Set of
15 Interrogatories (the "Sharp Interrogatory Responses"). These responses are designated as
16 "Confidential" under the Stipulated Protective Order.

17 5. On February 4, 2014, the Toshiba Defendants filed an Opposition to Sharp's
18 Motion for Leave to File Response to the Toshiba Defendants' Supplemental Reply Brief
19 (the "Opposition").

20 6. Portions of the Opposition contain discussion of material in the Sharp
21 Interrogatory Responses. As such, the Toshiba Defendants filed portions of the Opposition
22 under seal.

23 I declare under penalty of perjury under the laws of the United States of America that
24 the foregoing is true and correct.

25 Executed this 4th day of February, 2014, in Washington, D.C.

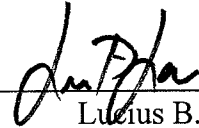
26
27 
28 Lucius B. Lau

DECLARATION OF LUCIUS B. LAU IN SUPPORT OF THE
TOSHIBA DEFENDANTS' ADMINISTRATIVE MOTION TO FILE
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Case No. 07-5944 SC,
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CERTIFICATE OF SERVICE

On February 4, 2014, I caused a copy of "DECLARATION OF LUCIUS B. LAU IN SUPPORT OF THE TOSHIBA DEFENDANTS' ADMINISTRATIVE MOTION TO FILE DOCUMENT UNDER SEAL PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-5(d)" to be electronically filed via the Court's Electronic Case Filing System, which constitutes service in this action pursuant to the Court's order of September 29, 2008.



Lucius B. Lau

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